

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Breanna L. Taurino : No. 18-11172-ELF
Debtor :

ANSWER TO MOTION OF LAKEVIEW LOAN SERVICING, LLC.
FOR RELIEF FROM THE AUTOMATIC STAY

Debtor, by her Attorney David M. Offen, respectfully submits the following:

The debtor's employment was furloughed as a result of the statewide shutdown due to COVID-19 in March. The debtor reached out to her attorney to advise of the same and at that time she was advised to reach out to the Movant to request forbearance or deferment of payments. The debtor was advised by the Movant that she did not qualify for forbearance but that she would not be charged any late fees or penalties for missing payments. The debtor was unable to make regular payments during the months of April through June 2020 as she had not yet received unemployment until June 1, 2020. The debtor made a payment of \$980.59 to the Movant of April 23, 2020. The debtor has since returned to work and is asking for the chance to catch up or to request forbearance or deferment in consideration of the CARES Act.

WHEREFORE, Debtor respectfully requests this Honorable Court to deny Movant's Order granting relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 6/29/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of Lakeview Loan Servicing, LLC.
Bkgroup@kmlawgroup.com

Dated: 6/29/20

/s/ David M. Offen
David M. Offen
Attorney for Debtor